



SDMS DocID

2075204



BROWN UNIVERSITY

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VIA FEDERAL EXPRESS

September 26, 2005

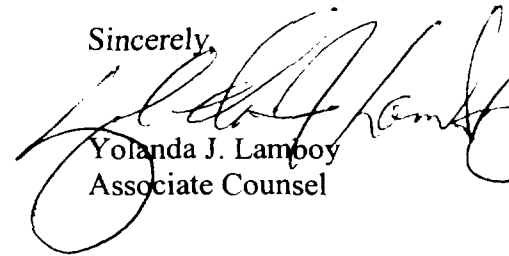
Harry R. Steinmetz (3HS62)
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 3
1650 Arch St.
Philadelphia, PA 19103-2029

Re: Safety Light Corporation Site
Bloomsburg, Pennsylvania

Dear Mr. Steinmetz:

Please find enclosed Brown University's response to the request for information and production issued by the United States Environmental Agency, Region 3 ("EPA") relative to the EPA's investigation of the Safety Light Corporation Site in Bloomsburg, PA.

Sincerely,



Yolanda J. Lamboy
Associate Counsel

YJL:oo

Enclosures: as noted

xc: Beverly E. Ledbetter, Esq.
Stephen Morin
Lauren Rikleen, Esq.

Answers to EPA Letter dated July 27, 2005

To the best of its knowledge based on diligent search and inquiry, Brown submits the following in response to the United States Environmental Protection Agency, Region 3, request for information and documents relating to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), and pollutants and/or contaminants as defined by Section 101(33), 42 U.S.C. Section 9601(33), which were transported to, stored, treated, or disposed of at the Safety Light Corporation Site in Bloomsburg, Pennsylvania:

1. The business relationship between Brown University (Brown) and Safety Light Corporation (SLC) was limited in scope and duration to the following transactions:
 - The record in EPA's possession represents material shipped to Brown University from the Safety Light site for a purchase of 5 mCi of Po-210 (in the form of polonium nitrate) in 1959. By way of background information, Po-210 is a short-lived radioactive material (half-life of 138 days). After ten half lives (or 1380 days), the radioactivity is insignificant; i.e., if it was purchased in 1959, it would have decayed by 1963. Brown University has no record of having shipped the Po-210 back to the Safety Light site.
 - Review of the files indicates that Brown may have purchased approximately thirty (30) tritium (H-3) targets from U.S. Radium Corporation prior to 1960. These tritium targets were disposed of at a facility in Massachusetts in 1982, and were not disposed of at the Safety Light Site.
 - In December, 2001, Brown shipped forty (40) self-luminous exit signs (manufactured in 1988) to Safety Light Corp, at the direction of Evenlite Inc. At the time of purchase, each self-luminous exit sign contained 20 curies of tritium (H-3). By the time the exit signs were shipped back to Safety Light in 2001, the activity for each sign would have decayed to approximately 9.6 curies each. Safety Light had an NRC License # 37-00030-08 to accept H-3. The shipment was done in accordance with all applicable NRC Regulations. See Attachment A.
2. Brown has not transported nor brokered hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U. S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite to the Site.
3. Not applicable. See response to question number 2.
4. With the exception of the one-time shipment in December, 2001 of the exit signs (as more fully described in paragraph 1 above), Brown did not generate any

wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite at the Site.

5. Not applicable.
6. The persons who were consulted or who supplied documents to prepare these answers are:
 - Ninni Jacob, Radiation Safety Officer, Environmental Health and Safety, Brown University 164 Angell Street, Box 1914, Providence, RI 02912. Phone: (401) 863-3353
 - Stephen Morin, Director, Environmental Health and Safety, Brown University, 164 Angell Street, Box 1914, Providence, RI 02912. Phone: (401) 863-3353
 - Henry Huppert, Environmental Compliance Officer, Environmental Health and Safety, Brown University, 164 Angell Street, Box 1914, Providence, RI 02912. Phone: (401) 863-3353
 - Richard Shea, Radiation Safety Specialist, Environmental Health and Safety, Brown University, 164 Angell Street, Box 1914, Providence, RI 02912. Phone: (401) 863-3353
 - Donald Maxson, Professor Emeritus, Physics Department, Brown University, at 184 Hope Street, Box 1843, Providence, RI 02912 Phone: (401) 863-2641

We do not know of any other persons able to provide more detailed or complete responses to any questions contained in your letter or, who may be able to provide additional responsive documents.

7. We believe that the information contained herein is responsive to your Information Request and we know of no additional information or documents held by others that would be responsive.
8. We have no information about other parties who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site.
9. We are not aware of any documents solicited in this information request that are no longer available.

ATTACHMENT A

BACKGROUND DOCUMENTS REGARDING EXIT SIGNS

COPY

220 Document Maintenance

11/19/01 11:27AM
FY 2002 CC BR

Screen: ___ Doc: R156206 Line: 1__ Invoice: _____

-----Document Line Maintenance-----	
Line: 1	-----Line Extended Description-----
Quantity: 40.00	
UOM: EA	FOR DISPOSAL OF 40 TRITIUM EXIT
Unit Price: 40.000	SIGNS
Description: FOR DI	
SIGNS	CONFIRMATION - DO NOT DUPLICATE
Account: _____	NEW VENDOR: EVENLITE INC.
Inventory: _____	3161 STATE ROAD
Tax Code: _____	BENSALEM, PA 19020
Print: -	
	PLEASE CHG. ACCT. # TO 2-30129

Net document total is 16

Enter-PF1---PF2---PF3---PF4---PF5---PF6---PF7---PF8---PF9---PF10---PF11---PF12---
HELP Notes Exit Accts Desc Ovrld ANext Trail
4-© 1 Sess-2 128.148.18.13 TCPVT219 19/63

COPY

F3158 Document has been transferred
220 Document Maintenance

11/26/01 2:32PM
FY 2002 CC BR

Screen: ___ Doc: R156206 Line: ___ Invoice: _____

Class: R

R E Q U I S I T I O N

Type: RO

Regular Order

EVENLITE, INC.

Vendor: _____

Document Date: 11/19/2001

Start Date: _____

Cost: A Status: _

Reference: P944821/

End Date: _____

Buyer/Phone: _____

Quote Date: _____

Ref: _____

Hazard: Y

Change Date: _____

Nbr: _____

Vendor Terms: _____ Currency: _____ FOB: _____

Contact: _____

Print: _ Last:

Net document total is **\$1600.00**

Status is TRANSFERRED

Enter-PF1---PF2---PF3---PF4---PF5---PF6---PF7---PF8---PF9---PF10---PF11---PF12---

HELP	Notes Warn	Distr Accts VBS	Addr	StTxt Text	Flags Lines
4-©	1 Sess-2	128.148.18.13		TCPVT232	4/12

118 Invoice File List

EVENLITE INC.

08/26/05 12:00

FY 2006 CC BR

Screen: ____ Vendor: V0015943060

Invoice	Amount	Date	Voucher	PO No	Check	Amount	Date St
0003597-IN	1,600.00	032802	0736075	P944821	338014	1,600.00	042902 C

Enter-PF1---PF2---PF3---PF4---PF5---PF6---PF7---PF8---PF9---PF10--PF11--PF12---

HELP Notes Exit

Vndr Extnd

4-c

1

Sess-1

128.148.18.13

TCPVT277

4/12



emp. 572070 26SEP05

PRIORITY OVERNIGHT

TUE

Deliver By:
27SEP05
A1

TRK# 8513 2339 0785 FORM 0215

19103 -PA-US

PHL
Z9 PSQA

48

52

FedEx US Airbill
ExpressFedEx
Tracking
Number

8513 2339 0785

1 From This portion can be removed for Recipient's records

Date 9/26/05

FedEx Tracking Number

851323390785

Sender's
Name Nathan C. Bell

Phone 401 863-9900

Company BROWN UNIVERSITY & GEN COUNSEL

Address 110 S MAIN ST

Dept./Floor/Suite/Room

City PROVIDENCE

State

ZIP 02903-2900

2 Your Internal Billing Reference

3 To

Recipient's
Name Harry C. Steinhilber (3512)

Phone 215 346-5700

Company U.S. Environmental Protection Agency, Region 2

Recipient's
Address 1650 Arch Street

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Dept./Floor/Suite/Room

Address

To request a package be held at a specific FedEx location, print FedEx address here

City

State

ZIP

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

RECIPIENT: PEEL HERE

4a Express Package Service

Packages up to 150 lbs.

☒ FedEx Priority Overnight
Next business morning*☐ FedEx Standard Overnight
Next business afternoon*☐ FedEx First Overnight
Earliest next business morning
delivery to select locations*☐ FedEx 2Day
Second business day*☐ FedEx Express Saver
Third business day*

*FedEx Envelope rate not available. Minimum charge. One-pound rate.

4b Express Freight Service

Packages over 150 lbs.

☐ FedEx 1Day Freight*
Next business day**☐ FedEx 2Day Freight
Second business day**☐ FedEx 3Day Freight
Third business day**

*Call for Confirmation.

5 Packaging

*Declared value limit \$500

☒ FedEx
Envelope*☐ FedEx Pak*
Includes FedEx Small Pak,
FedEx Large Pak, and FedEx Sturdy Pak☐ FedEx
Box☐ FedEx
Tube☐ Other

6 Special Handling

☐ SATURDAY Delivery
Available ONLY for FedEx Priority
Overnight, FedEx 2Day, FedEx
1Day Freight, and FedEx 2Day
Freight to select ZIP codes☐ HOLD Weekday
at FedEx Location
Not available for
FedEx First Overnight☐ HOLD Saturday
at FedEx Location
Available ONLY for FedEx Priority
Overnight and FedEx 2Day
to select locations

Does this shipment contain dangerous goods?

☐ No☐ Yes
As per attached
Shipper's Declaration☐ Yes
Shipper's Declaration
not required☐ Dry Ice
Dry Ice, 9, UN 1845☐ Cargo Aircraft Only

Dangerous goods (including Dry Ice) cannot be shipped in FedEx packaging

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

☐ Sender
Acct. No. in Section
1 will be billed☐ Recipient☐ Third Party☐ Credit Card☐ Cash/Check

Total Packages

Total Weight

Total Charges

*Our liability is limited to \$100 unless you declare a higher value. See the FedEx Service Guide for details.

8 Sign to Authorize Delivery Without a Signature

By signing you authorize us to deliver this shipment without obtaining a signature
and agree to indemnify and hold us harmless from any resulting claims.
Questions? Visit our Web site at fedex.com
or call 1 800 GoFedEx 1 800 483 3339
JFK: Rev. Date 11/03/04 Part # 582779 © 1994-2003 FedEx PRINTED IN U.S.A.

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